1 SAMUEL R. MAIZEL (Bar No. 189301) samuel-maizel@dentons.com 3 SONIA R. MARTIN (Bar No. 235736) tania.meyron@dentons.com 1 Inia.meyron@dentons.com 1 TANIA M. MOYRON (Bar No. 235736) 1 Inia.meyron@dentons.com 1 INCIEDLAS A. KOFFROTH (Bar No. 2287854) 1 inchoas.koffrodf@dentoms.com 0 DENTONS US LLP 0 Intremostration (Intremostation) 1 INCIEDLAS A. KOFFROTH (Bar No. 2287854) 1 inchoas.koffrodf@dentoms.com 2 Debtors In Possession 1 Intre 2 Debtors In Possession. 2 Debtors and Debtors In Possession. 3 Affects All Debtors 4 Affects Suit Louis Regional Hospital Affects St. Vincent Houndation CASE NO: 2:18-bk-20165-ER CASE NO: 2:18-bk-20175-ER CASE NO: 2:18-b	Cas	e 2:20-ap-01001-ER Doc 48 Filed 02/25/20 Main Document ray	Entered 02/25/20 13:07:25 Decr Docket #0048 Date Filed: 2/25/2020 ye บบว
Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Image: Section 14 Imag	2 3 4 5 6 7 8 9 10 11	samuel.maizel@dentons.com SONIA R. MARTIN (Bar No. 191148) Sonia.martin@dentons.com TANIA M. MOYRON (Bar No. 235736) tania.moyron@dentons.com NICHOLAS A. KOFFROTH (Bar. No. 287854) nicholas.koffroth@dentons.com DENTONS US LLP 601 South Figueroa Street, Suite 2500 Los Angeles, California 90017-5704 Tel: (213) 623-9300 / Fax: (213) 623-9924 Attorneys for the Chapter 11 Debtors and Debtors In Possession UNITED STATES BAN CENTRAL DISTRICT OF CALIFO In re VERITY HEALTH SYSTEM OF CALIFORNIA, INC., <i>et al.</i> ,	RNIA - LOS ANGELES DIVISION Lead Bankruptcy Case No. 2:18-bk-20151-ER Jointly Administered With: CASE NO.: 2:18-bk-20162-ER CASE NO.: 2:18-bk-20163-ER CASE NO.: 2:18-bk-20164-ER
 Affects Verity Health System of California, Inc. Affects Verity Health System of California, Inc. Affects O'Connor Hospital Affects Saint Louise Regional Hospital Affects St. Francis Medical Center Affects St. Vincent Medical Center Affects Seton Medical Center Affects Seton Medical Center Affects St. Vincent Medical Center of Lynwood Foundation Affects St. Vincent Foundation Affects Verity Business Services Affects Verity Holdings, LLC Affects De Paul Ventures, LLC Debtors and Debtors In Possession. Continued Hearing Date and Time: Date: March 18, 2020 Time: 9:30 a.m. Place: Courtroom 1568 255 Angeles, CA 90012 	13	⊠ Affects All Debtors	CASE NO.: 2:18-bk-20167-ER
18201512002250000000007	 14 15 16 17 18 19 20 21 22 23 24 25 26 27 	 Affects Verity Health System of California, Inc. Affects O'Connor Hospital Affects Saint Louise Regional Hospital Affects St. Francis Medical Center Affects St. Vincent Medical Center Affects Seton Medical Center Affects O'Connor Hospital Foundation Affects Saint Louise Regional Hospital Foundation Affects Saint Louise Regional Hospital Foundation Affects St. Francis Medical Center of Lynwood Foundation Affects St. Vincent Foundation Affects St. Vincent Dialysis Center, Inc. Affects Verity Business Services Affects Verity Medical Foundation Affects Verity Holdings, LLC Affects De Paul Ventures, LLC Affects De Paul Ventures - San Jose ASC, LLC 	CASE NO.: 2:18-bk-20168-ER CASE NO.: 2:18-bk-20171-ER CASE NO.: 2:18-bk-20171-ER CASE NO.: 2:18-bk-20172-ER CASE NO.: 2:18-bk-20173-ER CASE NO.: 2:18-bk-20175-ER CASE NO.: 2:18-bk-20176-ER CASE NO.: 2:18-bk-20179-ER CASE NO.: 2:18-bk-20180-ER CASE NO.: 2:18-bk-20180-ER CASE NO.: 2:18-bk-20181-ER Chapter 11 Cases Hon. Judge Ernest M. Robles Adversary No. 2:20-ap-01001-ER STIPULATION CONTINUING HEARING DATE OF DEFENDANTS' SPECIAL MOTION TO STRIKE AND MOTION TO DISMISS AND RELATED BRIEFING SCHEDULE [RELATED DOCKET NOS. 39, 40] Continued Hearing Date and Time: Date: March 18, 2020 Time: 9:30 a.m. Place: Courtroom 1568 255 E. Temple St. Los Angeles, CA 90012
			182015120022500000000000

Case	2:20-ap-01001-ER D		Entered 02/25/20 13:04:25 2 of 5	Desc
1	VERITY HEALTH SYST	TEM OF CALIFORNIA.		
2	INC., a California nonpro			
3	California nonprofit publi			
4 5	nonprofit public benefit co FRANCIS MEDICAL CE	orporation, and ST.		
6	nonprofit public benefit co			
7	benefit corporation, and V LLC, a California limited	/ERITY HOLDINGS,		
8	Plaintiffs,			
9	V.			
10	KALI P. CHAUDHURI, I	M.D., an individual,		
11	STRATEGIC GLOBAL N California corporation, KI	MANAGEMENT, INC., a PC HEALTHCARE		
12	HOLDINGS, INC. a Cali HEALTH PLAN HOLDI			
13		THCARE, INC. a Nevada		
14	LLC, a California Limited DOES 1 through 500,			
15	Defendant	ts.		
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1	STIPULATION	
2	This Stipulation is entered between Verity Health System of California, Inc., a California	
3	nonprofit public benefit corporation, St. Vincent Medical Center, a California nonprofit public benefit	
4	corporation, St. Vincent Dialysis Center, Inc., a California nonprofit public benefit corporation, and	
5	St. Francis Medical Center, a California nonprofit public benefit corporation, Seton Medical Center, a	
6	California nonprofit public benefit corporation, and Verity Holdings, LLC, a California limited	
7	liability company (collectively, the "Plaintiffs"), the above-referenced affiliated debtors, the	
8	debtors and debtors in possession in the above-captioned chapter 11 bankruptcy cases, on the one	
9	hand, and Defendants Kali P. Chaudhuri, M.D., an individual, Strategic Global Management, Inc., a	
10	California corporation, KPC Healthcare Holdings, Inc., a California Corporation, KPC Health Plan	
11	Holdings, Inc. a California Corporation, KPC Healthcare, Inc. a Nevada Corporation, KPC Global	
12	Management, LLC, a California Limited Liability Company (collectively, the "Defendants"), on the	
13	other hand.	
14	RECITALS	
15	A. On January 3, 2020, the Plaintiffs filed its <i>Complaint For Breach of Contract, Promissory</i>	
16	Fraud, and Tortious Breach of Contract (Breach Of Implied Covenant Of Good Faith And Fair Dealing)	
17	[Docket No. 1] (the " <u>Complaint</u> "). At Defendants' request, Plaintiffs agreed to a one-week extension of	
18	time for Defendants to file a response to the Complaint.	
19	B. On February 19, 2020, Defendants filed a Special Motion to Strike Plaintiff's Complaint	
20	Pursuant to Cal. Civ. Proc. Code § 425.16 [Docket 39] (the "Special Motion to Strike") and a Motion to	
21	Dismiss Plaintiffs' Complaint [Docket 40] (the "Motion to Dismiss").	
22	C. Both the Special Motion to Strike and the Motion to Dismiss are set for hearing on March	
23	11, 2020, at 10:00 a.m., in Courtroom 1568, located at 255 E. Temple Street, Los Angeles, CA 90012.	
24	D. The Plaintiffs and Defendants have agreed to continue the hearing for the Motion to	
25	Dismiss and Special Motion to Strike from March 11, 2020, at 10:00 a.m., to March 18, 2020, at 9:30 a.m.,	
26	in Courtroom 1568, located at 255 E. Temple Street, Los Angeles, CA 90012. In accordance with the	
27	Local Bankruptcy Rules, the parties have agreed that Plaintiffs' Opposition briefs to the Special Motion to	
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1	Strike and Motion to Dismiss are due on March 4, 2020, and Defendants' Reply briefs to the Special			
2	Motion to Strike and Motion to Dismiss due on March 11, 2020.			
3	AGREEMENT			
4	NOW, THEREFORE, the parties to this Stipulation hereby agree and stipulate as			
5	follows:			
6	1. The deadline for Plaintiffs to file Opposition briefs to the Special Motion to Strike			
7	and the Motion to Dismiss shall be continued from February 26, 2020 to March 4, 2020.			
8	2. The deadline for Defendants to file Reply briefs for the Special Motion to Strike and			
9	the Motion to Dismiss shall be continued from March 4, 2020 to March 11, 2020.			
10	3. The hearing on the Special Motion to Strike and Motion to Dismiss shall be continued			
11	from March 11, 2020 at 10:00 a.m. to March 18, 2020 at 9:30 a.m.			
12				
13	Dated: February 25, 2020 DENTONS US LLP SAMUEL R. MAIZEL			
14	SONIA R. MARTIN TANIA M. MOYRON			
15	NICHOLAS A. KOFFROTH			
16	By /s/ Tania M. Movron			
17	By <u>/s/ Tania M. Moyron</u> Tania M. Moyron			
18	Attorneys for Plaintiffs Verity Health Systems of California, Inc., et al.			
19				
20	Dated: February, 2020 LEVENE, NEALE, BENDER, YOO & BRILL			
21	L.L.P. GARY E. KLAUSNER			
22	JEFFREY S. KWONG			
23				
24	By <u>/s/</u> Gary E. Klausner			
25	Attorneys for Defendants Strategic Global			
26	Management, Inc., et al.			
27				
28				

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1	Strike and Mation to Diamics are due on Marsh 4 2020 and Defendent 2 D. 1. 1. 1. 1. 1. 1. 1.		
1 2	Strike and Motion to Dismiss are due on March 4, 2020, and Defendants' Reply briefs to the Special		
	Motion to Strike and Motion to Dismiss due on March 11, 2020.		
3	AGREEMENT		
4	NOW, THEREFORE, the parties to this Stipulation hereby agree and stipulate as		
5	follows:		
6 7	1. The deadline for Plaintiffs to file Opposition briefs to the Special Motion to Strike		
8	and the Motion to Dismiss shall be continued from February 26, 2020 to March 4, 2020.		
o 9	2. The deadline for Defendants to file Reply briefs for the Special Motion to Strike and the Mation to Diamics shall be continued from March 4, 2020 to March 11, 2020.		
9	the Motion to Dismiss shall be continued from March 4, 2020 to March 11, 2020.		
10	3. The hearing on the Special Motion to Strike and Motion to Dismiss shall be continued		
11	from March 11, 2020 at 10:00 a.m. to March 18, 2020 at 9:30 a.m.		
12	Dated: February 25, 2020 DENTONS US LLP		
13	SAMUEL R. MAIZEL SONIA R. MARTIN		
14	TANIA M. MOYRON NICHOLAS A. KOFFROTH		
16	MCHOLAS A. KOFTKOTH		
17	By/ <i>s/ Tania M. Moyron</i> Tania M. Moyron		
18 19	Attorneys for Plaintiffs Verity Health Systems of California, Inc., et al.		
20			
21	Dated: February 25, 2020 LEVENE, NEALE, BENDER, YOO & BRILL L.L.P.		
22	GARY E. KLAUSNER JEFFREY S. KWONG		
23			
24	By /s/buick		
25	Gary E/Klausner		
26	Attorneys for Defendants Strategic Global Management, Inc., <i>et al.</i>		
27			
28			